



DATE: January 26, 1981

TO: Bill Child

FROM: Ken Bechley

SUBJECT: Will Co. Lockport/Union Oil C-81-26N

US EPA RECORDS CENTER REGION 5



425943

Outline of Events

- 7-31-80 Complaint received by Diane Spencer from Mrs. Simpson, concerning dumping of Sludge onto field, forwarded to Brad Benning.
- 8-1-80 Brad Benning and Mary Schroder inspect site. Spoke with Mrs. Rhode of Old Orchard Subdivision and Mr. Hass of Union Oils Environmental Div. See memo of 8-6-80. Took one sample of sludge and photos. Supplemental Permit No. 800107 for this sludge to go to Joliet/ESL shows it to be non-hazardous.
- 8-8-80 Returned to sludge field to take additional sample, to check for benzene and organics. Ron Patterson, subdivision owner to the east complains of sludge runoff coming onto his property. Will County sends letter to Union Oil describing zoning violations.
- 8-11-80 IEPA-DWPC sends mailgram to Mr. Hass of Union Oil asking for description of grading project.
- 8-19-80 Ted Denning of DWPC receives letter from Mr. Chromek, Regional Counsel explaining the disposal plan Union Oil used.
- 8-26-80 Returned to sludge field, booms and hay bails have been placed at east end to control runoff. 4 sludge samples and 1 water sample were collected at this time. Sludge was being disc-in to cats.
- 9-19-80 Received analysis from Ron Patterson on sludge sample Arro Labs took on 8-8-80. Chrome (28 ppm) is above RCRA limit of (5 ppm) - EP Toxicity Test -
- 9-29-80 Received analysis of 8-1-80. 48 - hr. leach showed no hazardous levels.
- 10-2-80 Received analysis of 8-8-80.
Fuel oil - 40,000 ppm
Cyclohexanes - 400 ug/g
Aliphatic hydrocarbons - 2000 ug/g
Benzene, toluene, xylene detected in headspace.
- 10-6-80 Received analysis of 8-26-80
48 hr. leach - non-hazardous
Water - non-hazardous

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- 11-13-80 Letter from residences of Old Orchard Subdivision to Michael Mauzy, asking for action against Union Oil Co.
- 1-20-81 Letter from residences of Old Orchard Subdivision to Mr. Van Ness, asking for EP Toxicity Test on sludge, and Union Oils Special Waste Disposal Appl.

All of the State and Private Analysis were sent to Rama Chataverdi for a final opinion. Rama stated that the state analysis uses a 48 hr. leach and not the EP Toxicity Test, therefore he could not relate it to the Hazardous Waste Standards for EP Toxic. The private lab (Arro) stated the used current EP Toxicity Test Method, and their Cr level was above EP Toxic Standard. It seems to finally resolve this problem the State should obtain new samples and run the EP Toxicity Test for Heavy Metals specifically for Chromium. Should our analysis show the sludge to be hazardous, any future disposal will have to be at a Hazardous Waste Site, or Union Oil must apply for a Hazardous Waste Disposal Permit for their facility.

The problem at this time is that the IEPA Lab cannot or will not do a EP Toxicity analysis, thus making it impossible for us to do our job. Can we contract a private lab to perform a EP Toxicity analysis on another sample from the point of waste generation? If so, what of problems relative to Lab certification? The best solution to this problem is the initiation of EP Toxicity analysis by our lab. Until that occurs we will continue to have the problem of comparing apples and oranges.

Based on the information available at the time I made what I felt was the correct decision as to whether or not the material was hazardous. Both Union Oils description of the waste, and the information in Joliet/ESL Permit No. 800107 should back up that decision. However, we cannot at this time address the Arro Lab analysis on chromium. This entire problem must be considered and the case resolved.

KPB/prg

cc: Division File
Northern Region

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